Message

From: Shewmake, Kenneth [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5031C1ABFE8847809A448EF4899DE65C-SHEWMAKE, KENNETH]
Sent: 4/15/2019 2:53:55 PM
To: Rebecca Storms [Rebecca.Storms@Tceq.Texas.Gov]; Kessinger,Jessica (DSHS) (Jessica.Kessinger@dshs.texas.gov) [Jessica.Kessinger@dshs.texas.gov]
CC: Tsui-Bowen, Alethea (Tsui-Bowen.Alethea@epa.gov) [Tsui-Bowen.Alethea@epa.gov]; Rauscher, Jon (Rauscher.Jon@epa.gov) [Rauscher.Jon@epa.gov]; Pereira, Stephen (pereira.stephen@epa.gov) [pereira.stephen@epa.gov]
Subject: Lane Plating scoping meeting
Attachments: Lane Rev 00 SAP RTCs_14Mar19_with highlights comments to be considered during Phase 2.docx

I discussed the Lane Plating scoping meeting planned for Wednesday 4/17 with our contractor, Mark Paddack. He compiled the following comments from our work on the SAP. Another suggestion was to do a wetlands survey and additional background sampling. I am forwarding this to the team to think about before our call.

Kenneth Shewmake
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From: Paddack, Mark <mpaddack@eaest.com>
Sent: Monday, April 15, 2019 9:34 AM
To: Shewmake, Kenneth <shewmake.kenneth@epa.gov>
Subject:

Mr. Shewmake:

As we discussed this past week, I went back through prior comments and compiled the below list of items for consideration when planning the Phase 2 RI field event. As a reference, I've also included a copy of the Response to Comments to the Draft Sampling and Analysis Plan (SAP), where these commented were derived from. As indicated below, TCEQ had an additional set of comments to the Draft Final SAP; but there comments were related to use of PCLs when doing the risk assessments, and not additional sampling. I also included the recommendation from the Texas Department of State Health Services (TX DSHS) regarding two the two sample locations they were requesting to make sure these get included during the planning phase.

As we briefly discussed list week, I'm also thinking an offsite background study should be considered for soil in order to asses naturally occurring metals at the site. Please let me know if you have additional questions/comments concerning this matter. If you would like me to sit in on the call, please let me know and I will verify my availability and plan from there. Otherwise, you and I can discuss after the call as part of the Phase 2 RI planning activities.

Thank You,
Mark Paddack

EA Project Manager

EPA

1. Consider a high resolution characterization for the unconsolidated alluvium underlying the site by multi-level vertical profiling of the alluvium using direct push technology.
2. Consider conducting a video log of the two existing water wells on the property to determine the well construction, depth and screen intervals.
3. Consider additional background sample locations for sediment and surface water (further west along the unnamed stream and north along Stream 5A2 . (this now especially holds true for the Unnamed Stream since a portion of the originally planned sample locations had to be shifted from this feature to the two ponds and drainage features between the ponds to address other TCEQ comments.

TCEQ

1. Running additional analysis of TPH by TX1006 on samples with detected concentrations of TPH by TX1005 to determine risk-based cleanup levels for each identified TPH source type.
2. Further sediment and surface water sample locations upstream (west) in the unnamed stream during the Phase 2 RI sampling event; a portion of these samples may also be used to evaluate background conditions for sediment and surface water in this drainage feature.
3. Based on the results of the Phase 1 soil sampling, expand the Phase 2 soil sampling event to address data gaps, including additional soil boring locations, and /or deeper depth intervals at some of the existing locations if the deepest Phase 1 interval still had screening level exceedances.
4. Consider sampling Five Mile Creek during future RI sampling if contamination is confirmed present in the site drainage system.
5. During the Phase 1 RI, the interval for sediment sample collection will be 0.0 to 0.5 feet. Based on the results of the Phase 1 sediment sampling event, additional sediment samples may be collected from 0.5 to 1.0 feet in the locations at Phase 1 locations where COPCs exceed screening criteria in the 0.0 to 0.5 feet interval.
6. Complete a wetlands survey if contamination is verified in the surface water pathway.
7. Evaluate the hydraulic gradient of the shallow ground water bearing unit(s) in the site vicinity.
8. Evaluate and delineate the small, interconnected streams and ponds of the surface water pathway located east of the site (this would be completed in conjunction with the Wetlands Survey).
9. Expand the groundwater assessment, as necessary, during the Phase 2 RI activities, based on the findings of the Phase 1 RI field activities.
10. Recommends placing monitoring wells 1) adjacent to the site water wells for comparison of analytical data because the water wells have unknown depths and screen intervals, and 2) at an up gradient location.
11. recommends adding potential source area soil boring locations near previous sample locations I10 and G5, where some of the deepest known exceedances of RSLs are located, to determine the vertical extent of contamination.
12. TCEQ noted a rectangular depression area situated between the site facility building and small stock pond and near the overland route that may be frequently or permanently filled with water. Soil boring locations DSB-5 and/or DSB-7 will be used to assess this area as part of the Phase 1 RI field activities. If it is determined this area is impacted based on the Phase 1 sampling event and this feature is determined to hold water perennially, then additional characterization of this feature, to include sediment and/or surface water will be considered during the Phase 2 RI field event.

(Note: If you recall, TCEQ has an additional set of comments for the Draft Final SAP; however, these were related to using their PCLs when performing risk assessments, and were not related to additional sample locations.

TX DSHS

1. Recommendation for a soil sample near the nearest residential area northwest of the site, and in the vicinity of the baseball field located south of the site.